

# Law Offices of Colin Mulholland

Employment and Civil Litigation

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July 11, 2025

**VIA ECF**

Honorable Valerie Figueredo  
United States Magistrate Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: Sanchez et al v. Park Ave. Apartments LLC et al, 23-cv-7081

Your Honor:

The parties have been diligently working together to prepare an agreement that is in the best interest of both parties. There was an ongoing tenancy relationship between the parties between the time we agreed in principle to settle this matter and executing a final long form agreement.

Counsel believes we have just recently arrived at a proposed resolution for presentation to the Court via Cheeks motion or Rule 68. If the Court would indulge one more extension, the parties would respectfully request until July 29, 2025 to present a Cheeks motion or file an accepted Rule 68.

The parties greatly appreciate the Court's patience with this matter.

Respectfully Submitted,

/s/ Colin Mulholland, Esq.

**MEMO ENDORSED**



**HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE**

Dated: 7/14/25

The extension requested herein is GRANTED.

The Clerk of Court is respectfully directed to

terminate the motion at ECF No. 46